

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

Case No. 22-20074

-v-

Hon. Nancy G. Edmunds

D-7 TAMARIOUS FAULKNER,

Defendant.

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GOVERNMENT'S SENTENCING MEMORANDUM

Tamarious Faulkner, “Poogi,” is the leader of the “Thorough Bread Family” (TBF) street gang in Jackson, Michigan. Under his supervision and direction, the members of the gang sold a unique “rocked-up” form of fentanyl known as “Poogi Dope.” This “Poogi Dope” had a reputation for being particularly potent. Law enforcement in Jackson attribute numerous fatal and non-fatal overdoses to “Poogi Dope.”

With Tamarious Faulkner at the helm, members of the gang frequently carried firearms and used them against rival gangs. Even after he moved to Texas, Tamarious Faulkner still controlled the day-to-day operations of the gang, and returned to Jackson regularly to manage the drug distribution network.

Tamarious Faulkner himself described TBF's place in the Jackson community when he posted to Facebook:



The Jackson community suffered greatly under Tamarious Faulkner and TBF's reign. After ATF and local enforcement collaborated to arrest and prosecute Tamarious Faulkner and numerous members of TBF, including his co-defendants here, violent crime and overdoses in Jackson dropped significantly.

For his role as the leader of this gang that wreaked havoc and destroyed communities and countless lives in Jackson, Michigan, Tamarious Faulkner deserves a sentence of 268 months in prison. Such a sentence is necessary to protect the public from Tamarious Faulkner, is just punishment for his offense, and will deter him and other members of TBF from returning to this criminal behavior.

I. STATEMENT OF FACTS

A. Thorough Bread Family Drug Conspiracy

The Thorough Bread Family “TBF” street gang was founded by Tamarious Faulkner in Jackson, Michigan. The ATF and other law enforcement agencies have been investigating TBF since at least 2019 for burglaries from Federal Firearms Licensees, the distribution of narcotics, violent crime, and for distributing a particularly dangerous version of fentanyl in the form of “Poogi Dope”. Poogi Dope is a unique and highly potent type of hard, glass-like (or “rocked-up”) fentanyl with a distinctive coloring.

Photo showing some of the fentanyl seized in this investigation:



As Tamarious Faulkner and TBF grew in prominence and numbers in Jackson, so did fentanyl overdoses and violence. (*See* Exhibit 1 – Letter from Christopher A. Simpson, Chief of Police, Jackson). Those overdoses destroyed and took many lives, including the life of G.S., whose mother, J.D. wrote a letter to this Court detailing the harm TBF and Tamarious Faulkner caused not just her and her daughter, but the entire community. (*See* Exhibit 2 – Letter from J.D., mother of G.S.). Multiple TBF members have been convicted of drug offenses in state court connected to fatal overdoses tied to “Poogi Dope,” including two of Tamarious Faulkner’s brothers, Zaire Faulkner and Tirique Faulkner, whose convictions predated the conspiracy charged here.

As a result of the violence and overdoses attributed to TBF, ATF and other law enforcement began investigating TBF, including by making undercover purchases of fentanyl from TBF members from 2019 through 2022, and eventually by obtaining wiretap orders for phones used by Tamarious Faulkner and other high-ranking members of the gang, co-defendant Demond Johns and Dominique Faulkner.

Consistently, those recorded calls showed that Tamarious Faulkner was not just a figurehead for the gang and not just the namesake for its signature product, but that he was also deeply involved in its daily operations. Whenever a TBF member had legal trouble, everyone's first call was to Tamarious. If a TBF member had an issue with another member stealing some of their customers, they called Tamarious. He may have been living in Houston where he kept all of his profits in his home with his children and guns, but he was still running the business. A select few examples are detailed below.

Tamarious Faulkner's conduct is detailed even further in the Presentence Report at ¶¶12–32, as well as in prior filings in this court. (See ECF No. 120, PageID.507–551, Response to Tamarious Faulkner's motion to revoke order of detention; ECF No. 122, PageID.553–558, Order denying motion to revoke order of detention; ECF No. 245, PageID.1547–1600, Response to Brittany Bartkowiak's motion to suppress).

Tamarious Faulkner comes to Jackson to prepare drugs for distribution

While Tamarious Faulkner spent a lot of time in Houston, he returned to Jackson regularly on business trips. For example, ATF

agents identified a stash house used by Tamarious Faulkner and Dominique Faulkner on 3rd Street in Jackson and setup a camera for long term surveillance. Co-defendant Heather Dolan lived at that house; however, Tamarious Faulkner was seen going to the residence and entering through the front door with a key. Heather Dolan herself was addicted to “Poogi Dope,” and undoubtedly one more person taken advantage of by Tamarious Faulkner when he used her home as his stash house.

On December 13, 2021, Tamarious Faulkner contacted Dolan:

FAULKNER:	Hello?
DOLAN:	Hey.
FAULKNER:	What's up, dog?
DOLAN:	I just uh, wondering if you was gonna come over before Christmas and bake them cookies that you had.
FAULKNER:	Uh, no, I probably won't be there before Christmas.
DOLAN:	Oh, well, like, I think we need to. [Laughs] I want some.
FAULKNER:	Alright, I got you. I got you.
DOLAN:	You know what I'm saying? Alright get with me.
FAULKNER:	Alright.
DOLAN:	Alright, bye.
FAULKNER:	Alright.

Tamarious Faulkner then discussed his call with Dolan with his brother, Dominique Faulkner. Dominique explains he gave Dolan, “what

I had,” and Tamarious Faulkner laments about Dolan knowing “shit,” *i.e.*, his business dealings and plans to travel to Jackson.

Dominique FAULKNER:	Hello?
FAULKNER:	Hello?
Dominique FAULKNER:	What up, do [PH]?
FAULKNER:	Aye, you ain't go to Heather house? Not goin' to her tonight, and like, that's fine. [Voices overlap]
Dominique FAULKNER:	I already ... [Stutters] I already, I already go to her. What the fuck she still callin' for? I told her. I told—I gave her what I had. She only had ... shit, damn. I gave the shit—she [PH] gave it to her.
FAULKNER:	A'right. [Third party voice begins]
Dominique FAULKNER:	Yeah. So she, she be straight. So, she be straight and stuff [PH]— [Voices overlap]
FAULKNER:	Nah. Her ass just be blowin' me up. That's why I ain't even want her to know shit.
Dominique FAULKNER:	Yeah.
FAULKNER:	A'right.
Dominique FAULKNER:	Just ... a'ight.

Tamarious Faulkner was not flying from Houston to Jackson to “bake cookies.” He was, however, heading to Jackson to cook “Poogi Dope.” And, given its unique formula, and based on other wiretap calls, only a select few know how to prepare it properly, including Tamarious Faulkner.

On December 15, 2021, two days later, Tamarious Faulkner flew to Jackson. Dominique Faulkner picked him up at the airport and took

him to an apartment on Roxbury. Dominique Faulkner told Tamarious Faulkner that he didn't have any fentanyl ready to sell, "I ain't got none." Tamarious responded, "Alright, well, I'm baking."

Tamarious Faulkner takes care of TBF members when they get arrested, and provides protection for them in custody.

On January 7, 2022, ATF Agents raided TBF member Demarious Cockream's residence. Cockream was separately prosecuted and received a 10-year prison term for the fentanyl (including "Poogi Dope") found at his house. (E.D. Mich. Case 22-cr-20035). Shortly after the raid, Tamarious Faulkner spoke to another TBF member. They discussed what evidence was found. The other TBF member tells Tamarious Faulkner that "When he call you though, tell that n***a call me, man." Tamarious Faulkner responds, "Shit, he ain't calling me. I know that much. . . . Man, cause all my n***as know, bro. When y'all get locked up. . . . I'll help out with whatever y'all need, lawyers—whatever but n***a, I don't want talk on that phone."

Similarly, in December 2021, Tamarious Faulkner spoke to the mother of another TBF member that was recently arrested. Tamarious Faulkner reassured the mother that the TBF member would be protected while in prison by other TBF members and people that

Tamarious Faulkner had in prison looking out for him. Tamarious Faulkner said he wanted to help out more directly, but was afraid of getting too involved, because he believed the police were watching him.

Tamarious Faulkner orders TBF members to give Brittany Bartkowiak a gun.

In November 2021, co-defendants Zaire Faulker and Demond Johns spoke on the phone about a gun that was to be given to co-defendant Brittany Bartkowiak. Zaire Faulkner asked Demond Johns whether he wanted to give the gun to Brittany Bartkowiak. Demond Johns asked, “The gun?” In response, Zaire Faulkner told Demond Johns, “Yeah, the one Poogi was giving her.” Further calls and conversations showed Demond Johns and Brittany Bartkowiak arranged to meet up, and Demond Johns gave her the gun on Poogi’s behalf. Bartkowiak was stopped a short time later and the gun found under the front seat of her car. She has since pled guilty to possessing that gun as a convicted felon.

Tamarious Faulkner’s arrest and search warrants

On February 28, 2022, ATF agents arrested Tamarious Faulkner at the Detroit Airport as he prepared to return to Houston. He has keys with him, including a key that opened the padlock to the locked room at

Heather Dolan's house. The next day, agents raided several locations in Jackson and Lansing. Several co-conspirators were arrested. Agents recovered firearms from multiple TBF members and recovered fentanyl from multiple locations.

At Dominique Faulkner's residence in Lansing, agents found gang paraphernalia, a money counter, a firearm box, firearm magazines, and multiple cell phones. Around 20 grams of "Poogi Dope" was found in his car and another firearm magazine. Dominique Faulkner wore a lanyard with the keys to Heather Dolan's house and the locked room inside.

At Heather Dolan's 3rd Street residence, agents found a room locked with a padlock. Inside that room, agents found approximately 90 grams of fentanyl, consistent with "Poogi Dope," scales, a hydraulic press, a vacuum sealer, and a blender, all used to prepare fentanyl for distribution. Heather Dolan did not have a key to the padlock to the room. But Tamarious Faulkner and Dominique Faulkner did.

At the Roxbury apartment, where Tamarious Faulkner was "baking cookies" in December, agents found a locked safe. Inside the safe, agents found 4 handguns (2 of which were stolen, 1 from an FFL burglary in the fall of 2021), and approximately 1,000 grams of

fentanyl. Dominique Faulkner's lanyard he wore had a key to the locked safe.

At Tamarious Faulkner's residence in Houston, agents pulled over his girlfriend after she dropped her children off at school. She told agents she had two guns in the house, and identified a handgun found in the car with her (Ruger Model 57 pistol, SN: 641-58671), and another handgun that was in her bedroom closet on the shelf "inside a box." Inside the residence, agents found more guns and other evidence, including:

- Glock Model .44 pistol, SN AEMA554 (master bedroom closet shelf)
- Cobra CB9 handgun, SN CT201200 (inside a Ruger box on the master bedroom closet shelf, possibly the second firearm referenced by his girlfriend)
- Glock Model 48 9mm pistol, SN BMMK647 (master bedroom dresser drawer)
- Rom Arm Micro Draco pistol, SN: PMD-22730-20 (left side drawer of bed in master bedroom)
- American Tactical Mil Sport Multi Cal firearm, SN: MSA045381, loaded with one magazine and one round in the chamber (master bedroom closet)
- Assorted firearm magazines and ammunition
- A money counter

Through ATF's investigation, numerous incriminating conversations were recorded among the gang members and co-conspirators regarding the distribution of narcotics and the possession of firearms. ATF executed several search warrants and seized large amounts of fentanyl and several firearms during the investigation. As leader of TBF, and the fentanyl drug conspiracy, all the conduct and criminal activity of all the TBF members during the conspiracy is on Tamarious Faulkner's shoulders, and he should be held accountable for it.

Tamarious Faulkner and TBF played such a key role in driving violence and overdoses and crime in Jackson during this time, that the Chief of Police noted a nearly immediate and substantial drop in violence and overdoses after Tamarious Faulkner and his fellow TBF members were taken and held in custody. (Exhibit 1 – Letter from Chief of Police). This is not mere coincidence. While the Jackson community has started to heal, and still faces many challenges, protecting the future well-being of Jackson requires a lengthy term of incarceration for Tamarious Faulkner.

II. ADVISORY GUIDELINE RANGE

The United States Probation Department calculated Tamarious Faulkner's guideline range as 210 to 262 months, based upon a total offense level of 35 and criminal history category of III.

The government agrees with this guideline calculation; however, Tamarious Faulkner has objected to the 2-level enhancement for firearms being possessed under USSG § 2D1.1(b)(1), and to his criminal history score calculation. There is ample evidence that Tamarious Faulkner and several of his co-conspirators possessed firearms as part of this conspiracy, and that their possession of those firearms was foreseeable to him. *See United States v. Barron*, 940 F.3d 903, 911-912 (6th Cir. 2019). As to his criminal history score, the Probation Department correctly scored his history. Even were his conviction for use of marijuana in 2014 not scored, he would still fall under criminal history Category III with 4 points remaining. The Court should overrule his objections and adopt the Presentence Report as written.

- A. The firearm enhancement under USSG § 2D1.1(b)(1) should be applied.

Tamarious Faulkner pled guilty to a fentanyl trafficking conspiracy involving at least 1,200 grams of fentanyl over a 9-month

period. Several of his co-conspirators possessed large quantities of fentanyl during the conspiracy, and many of them, including Tamarious Faulkner himself, possessed firearms, including firearms kept in the same location as large quantities of fentanyl.

The firearm enhancement should apply here based upon Faulkner's actual possession of firearms at his residence in Houston, Texas, where he used the firearms to protect the profits of this drug conspiracy (at least \$320,000 over the 9 month period, as he agreed to in the forfeiture money judgment in his plea, *See* ECF No. 323, PageID.2161–2165, Plea Agreement), and because his co-conspirators' possession of firearms was reasonably foreseeable to him (and he had actual knowledge of their possession of firearms).

The guidelines provide for a 2-level enhancement under USSG § 2D1.1(b)(1) when “a dangerous weapon (including a firearm) was possessed.” This includes actual possession by the defendant. In a conspiracy, “possession of a gun by one coconspirator is attributable to another coconspirator if such possession constitutes reasonably foreseeable conduct.” *Barron*, 940 F.3d at 911-912. The Sixth Circuit requires, at a minimum, evidence that the defendant either knew a

weapon was present, or “knew it was reasonably probable that his coconspirators would be armed.” *Id.* at 912. However, for cases involving large quantities of drugs in one location, the Sixth Circuit has found a coconspirator’s possession of a firearm to be reasonably foreseeable on that basis alone. *Id. Citing United States v. Wade*, 318 F.3d 698, 702 (6th Cir. 2003).

Judge Stephen J. Murphy, III, who sentenced most of Tamarious Faulkner’s co-defendants, applied the firearm enhancement under USSG § 2D1.1(b)(1) to nearly all of his co-conspirators who he led, including Dominique Faulker, Demond Johns, Tommy Owens, Zaire Faulkner, and Mario Murguia. As leader of the conspiracy, responsible for and well aware of the conduct of those who answered to him, Tamarious Faulkner surely should be held similarly accountable for the possession of firearms.

III. Law and Argument

A. Nature and circumstances of the offense; 18 U.S.C. § 3553(a)(1)

For years, local, state, and federal law enforcement in and around Jackson, Michigan, made numerous arrests that involved a unique drug containing fentanyl. The substance was a hard, cloudy, glass like

substance with a tint of color. On the street, the drug was nicknamed “Poogi Dope.” “Poogi” is the street name for Tamarious Faulkner, the leader of a violent street gang in Jackson named TBF. As part of his plea, Tamarious Faulkner admitted to being the leader of the drug conspiracy ran by TBF. And as noted by the Chief of Police, TBF was not only selling deadly fentanyl in Jackson, TBF was also linked to numerous violence acts, including shootings and homicide. (*See Exhibit 1 – Letter from Christopher A. Simpson, Chief of Police, Jackson*).

“Poogi Dope” had a reputation as a highly potent drug. As a result, it was in high demand in Jackson and the surrounding areas. Law enforcement believes “Poogi Dope” was the cause of numerous overdoses and overdoses causing death, including the death of G.S., and many others. (*See Exhibit 2, Letter from J.P., her mother*). Her story exemplifies the seriousness of Tamarious Faulkner’s conduct here.

Tamarious Faulkner’s role of coordinating the other members’ business, taking care of members when they get in trouble, and generally overseeing all of TBF business is what enabled the gang to be so successful at selling fentanyl in Jackson and is what enabled the

gang to cause so much harm to the community. His conviction and sentence here ought to hold him accountable for that harm.

B. History and characteristics of the defendant; 18 U.S.C. §3553(a)(1)

Tamarious Faulkner's history and characteristics include several prior convictions, and a history of doing poorly on supervision and HYTA probation. While he does not have any serious prior convictions, he does have a prior weapons arrest. This lack of significant history is unsurprising. Tamarious Faulkner was not a foot soldier in TBF, but its leader, calling the shots from Houston. This role which mostly insulated him from the risk of law enforcement encounters and criminal responsibility. Not until the ATF was able to wiretap his phone, was there enough evidence to prove his role and hold him responsible for all the harm he has caused as leader of TBF. Despite that, Tamarious Faulkner still does not have an unblemished history.

C. The sentence must reflect the seriousness of the offense, promote respect for the law, and provide just punishment; 18 U.S.C. § 3553(a)(2)(A)

Tamarious Faulkner's leadership of this conspiracy caused significant harm to the Jackson community. The ATF and law enforcement in Jackson County believe that Poogi Dope, this highly

sought after drug, was connected to an inordinate number of overdoses and overdoses causing deaths. Authorities in the Jackson area have connected dozens of deaths to Poogi Dope.

Despite his claims to the contrary in his letter to the Court, Tamarious Faulkner was well aware of the potency of Poogi Dope and its dangers. The drug's strength and unrelenting high were the characteristics that furthered its popularity. And two of his own brothers were convicted of offenses related to fatal overdoses involving Poogi Dope prior to this conspiracy. At the very time of the conspiracy charged here, Tirique Faulkner was already serving a state prison sentence for manslaughter in connection with Poogi Dope (and has since picked up a new federal drug case after his release on parole, E.D.Mich. Case 24-cr-20629). Another brother, and co-defendant here, Zaire Faulkner, served a state prison term for drug distribution related to a fatal overdose involving Poogi Dope.

The attached letters from the Chief of Police of Jackson (Exhibit 1) and J.D., mother of fatal overdose victim, G.S., (Exhibit 2) truly exemplify the seriousness of Tamarious Faulkner's conduct and underscore the harm he caused to the community. A sentence at the top

of the guideline range here would be just punishment and truly reflect the seriousness of his offense.

D. The sentence must afford adequate deterrence to criminal conduct and protect the public; 18 U.S.C. §§ 3553(a)(2)(B) and(C)

A lengthy sentence for Tamarious Faulkner will serve to protect the public. His conduct here, particularly his leadership role in this gang that wreaked so much harm on the Jackson community is such that he is very likely to reoffend. This is not an aberration in behavior. Despite his claims in his letter to the Court, the evidence shows he has had not had some great awakening and suddenly realized how deadly and dangerous fentanyl is and realized the error of his ways. That he was able to get his brother, and co-defendant Dominique Faulkner to write a letter to the Court claiming he's not even the leader of the gang shows how unserious his purported contriteness really is.

Fentanyl, Poogi Dope's main ingredient, is responsible for "two-thirds of all overdose deaths" ¹ "Nearly 70,000 people in the U.S.

¹ Deidre McPhillips, *New Report Details the Deadly Rise of Fentanyl in the US*, CNN, May 3, 2023, <https://www.cnn.com/2023/05/03/health/fentanyl-overdose-cdc-report/index.html>.

died of drug overdoses that involved fentanyl in 2021, almost a four-fold increase over five years.” *Id.* Tamarious Faulkner, in role as leader of TBF, the primary distributor of a dangerous and potent form of fentanyl is ultimately responsible for many such deaths in Jackson.

A sentence of 268 months for Tamarious Faulkner will deter him and others like him from similar criminal conduct in the future, and it will protect the public.

IV. CONCLUSION

For the reasons argued above, the government requests that this Honorable Court sentence Tamarious Faulkner to a term of incarceration of 268 months.

Respectfully Submitted,

JEROME F. GORGON JR.
UNITED STATES ATTORNEY

s/Andrew R. Picek

Andrew R. Picek

Matthew Roth

Assistant United States Attorneys

211 West Fort Street, Suite 2001

Detroit, Michigan 48226

313-226-9652

andrew.picek@usdoj.gov

Dated: June 17, 2025

CERTIFICATE OF SERVICE

I certify that on June 17, 2025, I electronically filed this motion for the United States with the Clerk of the United States District Court for the Eastern District of Michigan using the ECF system, which will send notification of such filing to all counsel of record.

/s/ Andrew R. Picek

Andrew R. Picek
Assistant United States Attorney
United States Attorney's Office
Eastern District of Michigan
211 West Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-9652
andrew.picek@usdoj.gov